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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

PLANNED PARENTHOOD FEDERATION OF
 AMERICA, INC., et. al.

Plaintiffs,

v.

CENTER FOR MEDICAL PROGRESS, BIOMAX
 PROCUREMENT SERVICES, LLC, et.al.,

Defendants.

Case No. 3:16-cv-00236-WHO

**DECLARATION OF DIANA STERK
 IN SUPPORT OF PLAINTIFFS'
 OMNIBUS MOTION TO EXCLUDE
 TESTIMONY OF DEFENDANTS'
 EXPERTS ON DAUBERT
 GROUNDS**

1 I, Diana Sterk, hereby declare as follows:

2 1. I am a Senior Associate at the law firm of Arnold Porter Kaye Scholer LLP, counsel
3 of record for Plaintiffs. I make this declaration in support of Plaintiffs' Omnibus Motion To
4 Exclude Testimony of Defendants' Experts on *Daubert* Grounds. I make this declaration based on
5 my personal knowledge and, if called as a witness, I would and could testify competently to these
6 matters.

7 2. Attached hereto as Exhibit A is a true and correct copy of the expert report of Paul
8 Zimmer dated March 15, 2019.

9 3. Attached hereto as Exhibit B is a true and correct copy of the supplemental expert
10 report of Mr. Zimmer dated May 1, 2019.

11 4. Attached hereto as Exhibit C is a true and correct copy of the deposition of Mr.
12 Zimmer dated May 2, 2019.

13 5. Attached hereto as Exhibit D is a true and correct copy of the expert report of Dr.
14 Elizabeth Eccher dated April 7, 2019.

15 6. Attached hereto as Exhibit E is a true and correct copy of Siok Swan Tan et al.,
16 *Comparing Methodologies For The Allocation Of Overhead And Capital Costs To Hospital*
17 *Services*, 12 Value in Health 530 (2009).

18 7. Attached hereto as Exhibit F is a true and correct copy of the expert report of James
19 Wood dated March 15, 2019.

20 8. Attached hereto as Exhibit G is a true and correct copy of the deposition of Mr.
21 Wood dated April 29, 2019.

22 9. Attached hereto as Exhibit H is a true and correct copy of the expert report of Dr.
23 Forrest Smith dated March 15, 2019.

24 10. Attached hereto as Exhibit I is a true and correct copy of the deposition of Dr. Smith
25 dated May 16, 2019.

26 11. Attached hereto as Exhibit K is a true and correct copy of the expert report of Dr.
27 Theresa Deisher dated March 15, 2019.

28 12. Attached hereto as Exhibit L is a true and correct copy of the deposition of Dr.

1 Deisher dated May 28, 2019.

2 13. Attached hereto as Exhibit M is a true and correct copy of the expert report of Brian
3 Prendergast dated March 14, 2019.

4 14. Attached hereto as Exhibit N is a true and correct copy of the deposition of Mr.
5 Prendergast dated May 1, 2019.

6 I hereby declare under penalty of perjury under the laws of the United States that the facts
7 set forth herein are true and correct.

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9 Dated: August 12, 2019

Respectfully submitted,

10 ARNOLD & PORTER KAYE SCHOLER LLP

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12 By: /s/ Diana Sterk

Diana Sterk

13 Attorneys for Plaintiffs
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